

201-13437

December 19, 2001

Christine Todd Whitman, Administrator  
U.S. Environmental Protection Agency  
P. O. Box 1473  
Merrifield, VA 22116

RE: Olefins Panel Test Plan for Low Benzene Naphtha Category, HPV Registration  
No. [REDACTED]

Dear Ms. Whitman:

The Olefins Panel of the American Chemistry Council submits its test plan and robust summaries for the Low Benzene Naphtha Category under the High Production Volume (HPV) Challenge Program. The CAS numbers in this category are listed in the attached table. This category includes streams that are mixtures containing primarily C5 through C12 olefins, paraffins, naphthenes, and aromatic molecules. The benzene content of these streams is typically less than 2%.

In preparing this test plan, the Panel has given careful consideration to the principles contained in the letter EPA sent to all HPV Challenge Program participants on October 14, 1999. As requested by EPA in that letter, the Panel has sought to maximize the use of scientifically appropriate categories of related chemicals and of structure activity relationships. The Panel has coordinated with other industry groups covering related chemicals. Additionally, and also as requested in EPA's letter, in analyzing the adequacy of existing data, the Panel has conducted a thoughtful, qualitative analysis rather than use a rote checklist approach. The Panel has taken the same thoughtful approach when developing this test plan and believes it conforms to those principles.

If you have any questions, please contact Elizabeth Moran, Manager of the Olefins Panel at (301) 924-2006 or [Elizabeth\\_Moran@americanchemistry.com](mailto:Elizabeth_Moran@americanchemistry.com).

Sincerely yours,

cc: C. Auer, EPA  
B. Leczynski, EPA  
S. Russell, ACC  
J. Keith, ACC

**CAS Numbers and Descriptions**  
**Associated with Streams in the Low Benzene Naphtha Category**

<b>CAS Number</b>	<b>CAS Number Description</b>
64741-98-6	Extract, petroleum, heavy naphtha solvent
64742-48-9	Naphtha, petroleum, hydrotreated heavy
64742-49-0	Naphtha, petroleum, hydrotreated light
64742-83-2	Naphtha, petroleum, light steam-cracked
68333-88-0	Aromatic hydrocarbons, C9-C17
68476-45-9	Hydrocarbons, C5-10 aromatic concentrate, ethylene manufacture by-product
68478-10-4	Naphtha, petroleum, light steam-cracked, debenzenized, C8-16-cycloalkadiene concentrate
68516-20-1	Naphtha, petroleum, steam-cracked middle aromatic
68527-23-1	Naphtha, petroleum, light steam cracked aromatic
68919-15-3	Hydrocarbons, C6-12, benzene-recovery

Note: The definitions, found in the TSCA Chemical Substance Inventory, for the CAS numbers included in this group are vague with respect to composition. Therefore, it is not uncommon to find that the same CAS number is correctly used to describe different streams (compositions) or that two or more different CAS numbers are used to describe the same stream (composition)